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5 Attorneys for LAPTALO ENTERPRISES, INC.,
dba JL PRECISION
6



7 **UNITED STATES DISTRICT COURT**

8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

9 EDEN ENVIRONMENTAL CITIZEN'S
GROUP, LLC, a California limited liability
10 company,

11 Plaintiff,

12 v.

13 LAPTALO ENTERPRISES, INC., dba JL
PRECISION, a California Corporation;
14 JAKOV LAPTALO, an individual;
MICHAEL LAPTALO, an individual; CARL
15 ITALIANO, an individual; and DOES 1-10,
inclusive,

16 Defendants.
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Case No. 4:18-cv-05544-YGR

**STIPULATION TO EXTEND DEADLINE
FOR EXCHANGE OF INITIAL
DISCLOSURES**

Judge: Hon. Yvonne Gonzalez Rogers
Crtrm.: 1, 4th Floor

Trial Date: None Set

1 Plaintiff EDEN ENVIRONMENTAL CITIZEN'S GROUP LLC ("Plaintiff") and
2 Defendant LAPTALO ENTERPRISES dba JL PRECISION ("Defendant") through their attorneys
3 of record, hereby stipulate as follows:

4 On January 16, 2019, Plaintiff filed an Amended Complaint for Injunctive and Declaratory
5 Relief, Civil Penalties and Remediation. In response, Defendant filed a Motion to Dismiss, which
6 is scheduled to be heard on March 19, 2019. The Court has scheduled the initial case management
7 conference on April 25, 2019. Based on upcoming events, the parties stipulate that it is in the best
8 interests to extend the time period to exchange initial disclosures, which is currently due on
9 February 28, 2019.

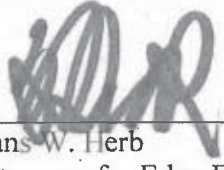
10 THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendant
11 that the deadline to exchange initial disclosures to Federal Rules of Civil Procedure Rule 26(a)(1)
12 is hereby extended to April 30, 2019.

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14 DATED: February 28, 2019

MEYERS, NAVE, RIBACK, SILVER & WILSON

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16 By: s/Shaye Diveley
17 Shaye Diveley
18 Attorneys for LAPTALO ENTERPRISES, INC.,
dba JL PRECISION

19 DATED: February 28, 2019

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21 By: 
22 Hans W. Herb
23 Attorneys for Eden Environmental Citizen's
Group, LLC

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